

RECEIVED

APR 26 2017

U.S. District Court
Eastern District of MO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
Eastern DIVISION

Ken Harris)

)

)

)

)

(Enter above the full name of the Plaintiff[s])

in this action.))

)

)

)

- vs -)

Cardinals)

)

Major League)

)

Botavia/Area Manager)

)

)

)

)

)

(Enter above the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a))

requires that the caption of the complaint)

include the names of all the parties. Merely)

listing one party and "et al." is insufficient.)

Please attach additional sheets if necessary.)

)

Case No. _____

(To be assigned by Clerk
of District Court)

COMPLAINT

- I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Discrimination in Public Place!

II.

Plaintiff, Ken Harris resides at

1212 N 13th St. Louis City
street address city county

MO, 63106, _____
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

III.

Defendant, Cardinals lives at, or its business is located at

700 Clark St. Louis City
street address city county

MO, 63102
state zip code

(if more than one defendant, provide the same information for each defendant below)

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

Defendant Botavia Area manager would not let me in with backpack! However she let 20 Whites in with Backpacks on 4-25-17 at 7:15 game Please see ticket.

Bolivia and I worked at Americas Center in Guest Services!

I have witnesses Lt Mike Martin Chief of Detectives St. Louis Police and Chief of Security at Cardinals game Lt Moelle is also a witness St. Louis POLICE!



V. Relief: State briefly and exactly what you want the Court to do for you.

Stop Discrimination and stop giving whites special privileges! Stop whites from carrying Backpacks in game when I can't.

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES

☒

NO

☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

200,000 to Deter Like and Similar Conduct

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

Cardinals Discriminate against Blacks

YES

☒

NO

☐

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 26 day of April, 2017



Signature of Plaintiff(s)